



Eric Gonzalez
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KINGS COUNTY**

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: LUIGI FORGIONE

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure:

THE NYPD NOTED THE FOLLOWING LAB NON-CONFORMANCE BY ANALYST FORGIONE: REGARDING 19-013 2019-028103 (4000660065), THE ANALYST DID NOT RECORD THE PRE-HOMOGENIZED WEIGHT OF AN ITEM PRIOR TO HOMOGENIZING THE SAMPLE FOR QUANTITATIVE ANALYSIS. THE ANALYST TOOK A POST ANALYSIS WEIGHT OF THE SOLID MATERIAL IN ORDER TO CALCULATE THE PURE WEIGHT OF THE COCAINE IN THE SAMPLE. AFTER QUANTITATIVE ANALYSIS THE PURE WEIGHT DROPPED BELOW THE 500 MG PURE WEIGHT CHARGE, WHEN TAKING UNCERTAINTY INTO ACCOUNT.

Eric Gonzalez
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